

First, allow me to thank the Commission and its staff for continuing to support an Amateur Radio Service in the United States. I know that sometimes supporting the service means putting up with inane comments and requests; however, I don't know of any other way for folks to really learn radio down at the hardware level. I am a licensed professional engineer currently working for a Federally-funded research and development center, and I "cut my teeth" in technology as an amateur radio operator.

I have reviewed the original petition. I am sympathetic to some extent with the petitioner's request but recommend that the current petition be rejected as too broad.

I believe the Commission should respond to certain specifics in the petition:

- a. I agree with the petitioner that an updated definition of "data" is necessary, and recommend that the Commission update Part 97 to address this. I believe that the Commission should also address digitized voice at this point as well. Along with this, I recommend that the Commission not attempt to continue trying to regulate by technology. I recognize that this is headed back towards "regulation by bandwidth", but if the Commission is going to get out of regulating by specific technology, then some form of regulation by occupied bandwidth is probably in our future.
- b. I agree with the petitioner that automated MF / HF stations should not be allowed to operate except in certain subbands, and that they should never be allowed to be considered anything other than automated stations; however, I recommend that the subbands (particularly on 80 meters) be made somewhat wider. I believe that growth in both waveform types and automation are bound to occur; I believe the Commission should encourage that growth. I also recognize, however, that the automated stations typically don't "play well" with non-automated stations. Providing specific areas where experimentation in these areas can occur is, to me, a good thing. It will be even better if operators understand that within those subbands they should not expect that they have priority over the automated stations.

An area that the petitioner did not address was the traffic being handled by the automated stations in question. Some of these stations are routing e-mail traffic to and from the Internet. I am concerned that the message traffic may actually be more commercial in nature, and as such is inappropriate for the amateur bands. I recommend that the Commission require such automated mail-forwarding stations make a copy of each message handled available for 3<sup>rd</sup>-party inspection at any time.

Thank you for your consideration of these comments.

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